

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

---

MARY TAMER, )  
Plaintiff, )  
v. ) Docket No.  
EDUCATION REFORM NOW ADVOCACY; )  
EDUCATION REFORM NOW; and )  
DEMOCRATS FOR EDUCATION REFORM, )  
Defendants. )  
\_\_\_\_\_  
)

**NOTICE OF REMOVAL**

**PLEASE TAKE NOTICE** that, on this date, Defendants Education Reform Now Advocacy (“ERNA”), Education Reform Now (“ERN”), and Democrats for Education Reform (“DER”, collectively, “Defendants”) have filed this Notice of Removal, pursuant to 28 U.S.C. §§ 1332, 1441, and 1446, in the office of the Clerk of the United States District Court for the District of Massachusetts. Removal is proper for the following reasons:

1. Defendants are defendants in a civil action pending in the Massachusetts Superior Court, Suffolk County, titled *Mary Tamer v. Education Reform Now Advocacy, et al.* (the “Pending Action”). The Pending Action was commenced on or about February 3, 2025 and is designated as Docket No. 2584-CV-00296.
2. Defendants’ Counsel accepted service of the Summons and Complaint on behalf of all Defendants on March 25, 2025. Therefore, this Notice of Removal is timely. Attached as **Exhibit A** is a true and correct copy of all process and pleadings served on Defendants in the Pending Action. The instant Notice of Removal is being filed within 30 days of the date

on which Defendants was provided with the Complaint in the Pending Action. 28 U.S.C. § 1446(b).

3. This case is a civil action alleging employment discrimination in violation of Massachusetts law that may be removed to this Court pursuant to 28 U.S.C. § 1332(a)(1) because the parties are citizens of different states and the amount in controversy exceeds \$75,000.
4. Plaintiff avers she is an individual residing in Massachusetts; and is, for purposes of diversity, a citizen of Massachusetts. *See Compl. ¶ 1.*
5. ERNA is a nonprofit corporation registered in Washington, D.C. with its principal place of business in New York. Thus, it is a citizen of Washington, D.C. and New York.
6. ERN is nonprofit corporation registered in Washington, D.C. with its principal place of business in New York. Thus, it is a citizen of Washington, D.C. and New York.
7. DFER is a nonprofit corporation registered in New York with its principal place of business in New York. Thus, it is a citizen of New York.
8. Under 28 U.S.C. § 1332(a)(1), federal courts have original jurisdiction over any action where the matter in controversy exceeds \$75,000 and parties are citizens of different states.
9. Plaintiff avers in her civil action cover sheet that her damages are over \$375,000. *See Civil Action Cover Sheet.*
10. As such, as the parties are citizens of different states and the amount in controversy exceeds \$75,000, this Court has diversity jurisdiction.
11. For this reason, this case may be removed to this Court by Defendants, pursuant to 28 U.S.C. §§ 1441(b) and 1446.

12. This Notice of Removal is being filed in the District of Massachusetts, the District Court of the United States for the district and division where the Pending Action lies. 28 U.S.C. §§ 1441(a) and 1446(b).
13. Pursuant to 28 U.S.C. § 1446(d), a copy of this Notice of Removal will be given promptly to Plaintiff's counsel. A copy of this Notice of Removal attached to the Notice of Filing of Notice of Removal, attached as **Exhibit B**, will also be filed promptly with the Clerk of the Massachusetts Superior Court, Suffolk County.
14. By filing this Notice, Defendants do not waive their right to object to service of process, the sufficiency of process, jurisdiction over the person, or venue, and specifically reserve the right to assert any defense and/or objections to which they may be entitled.

Respectfully submitted,

Education Reform Now Advocacy,  
Education Reform Now, and  
Democrats for Education Reform

By their attorneys,

/s/ Tara E. Lynch  
Tara E. Lynch, Esq. (BBO# 677831)  
Gregory E. Henninger, Esq. (BBO# 704222)  
Gordon Rees Scully Mansukhani, LLP  
28 State Street, Suite 1050  
Boston, MA 02109  
[tlynch@grsm.com](mailto:tlynch@grsm.com)  
[ghenninger@grsm.com](mailto:ghenninger@grsm.com)

Dated: April 8, 2025

**CERTIFICATE OF SERVICE**

I, Tara E. Lynch, hereby certify that on April 8, 2025, a copy of the foregoing document was filed through the ECF system sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

*/s/Tara E. Lynch*

Tara E. Lynch